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*Counsel to Meridian Comp Of New York, Inc.
D/B/A CHD Meridian Healthcare*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 11

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Case No. 08-13555 (JMP)

Debtors.

(Jointly Administered)

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**MERIDIAN COMP OF NEW YORK, INC. D/B/A CHD MERIDIAN
HEALTHCARE'S LIMITED OBJECTION AND RESERVATION OF RIGHTS
TO CURE COST**

Meridian Comp Of New York, Inc. D/B/A CHD Meridian Healthcare

("Meridian"), by and through its undersigned counsel, hereby files its limited objection (the "Limited Objection") to the amount of the cure cost asserted by the above captioned debtors (the "Debtors") in their List of Contracts and Leases to be assumed and assigned to the Purchaser at the closing (the "Notices"),¹ and hereby state as follows:

1. Meridian provides certain onsite healthcare services to the Debtors and/or various of their subsidiaries pursuant to three or more contracts with Lehman Brothers Inc. (the "Healthcare Contracts"). The Debtors and/or their subsidiaries also have

¹ <http://chapter11.epiqsystems.com/Lehman> (Last viewed on 9/19/2008 at 2:10 PM).

software contracts with the Debtors (the “Software Contract”, and with the Healthcare Contracts, the “Contracts”) that are used to provide these services.

2. Meridian was listed on the Notice, indicating that at least one of the Contracts will be assumed and assigned in connection with the sale of the Purchased Assets, although it is not clear whether all agreements with Meridian will be assumed and assigned.

3. Pursuant to the Notice, it appears that the Debtors intend to assume and assign the Contracts to Barclays Capital Inc. The Notice asserts a cure cost of \$213,902.00 (the “Asserted Cure Cost”).

4. Meridian has no objection to an assignment of the Contracts to Barclays. However, Meridian has not had sufficient time to complete diligence regarding the Asserted Cure Cost, but believes that the cost to cure the Contracts is at least \$548,761.58. Accordingly, Meridian respectfully reserves its rights to supplement this Limited Objection once it has determined the accurate cure amount that will be owed to Meridian.

Wherefore, Meridian hereby seeks the relief requested by this Limited Objection and such further relief as this Court may grant.

Dated: September 19, 2008
New York, New York

S/Shawn R. Fox
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